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August 21, 2018

VIA ECF

Honorable Joel Schneider, U.S.M.J. United States District Court District of New Jersey Mitchell H. Cohen Courthouse 4th & Cooper Streets Camden, NJ 08101

Re: Board of Trustees of the International Academy of Atlantic City Charter School v. SABIS

Educational Systems, Inc., et al.

Civil Action No.: 1:18-cv-11474-RMB-JS

Our File No. 04910-31842

Dear Judge Schneider:

As Your Honor knows, this firm represents the Defendants in the above-referenced case. I am following up to the case management conference Your Honor conducted with the parties on August 9, 2018 in preparation for the settlement conference scheduled for August 30, 2018. Your Honor inquired whether either party needs any documents from the other side for the settlement conference. After consulting with my client, it appears that Defendants need to review the report prepared by Plaintiff's investigator Richard Hale regarding a complaint of harassment by the former School Director Natakie Chestnut against SABIS personnel. It is our understanding that the report is complete and readily available.

I trust that Mr. Niedelman will provide us this document by tomorrow, Wednesday, August 22, 2018 so that I may have adequate time to review it before submitting SABIS' position statement regarding settlement.

I am available this afternoon and all day tomorrow for a telephone conference with Your Honor and Mr. Niedelman if necessary.

Respectfully submitted,

CAPEHART & SCATCHARD, P.A.

/s/ Sanmathi Dev

Sanmathi Dev

SD/amc

cc: Louis Niedelman, Esq. (Via ECF)